UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

IN RE PORK ANTITRUST LITIGATION

Case No. 18-cv-1776 (JRT/HB)

This Document Relates To: All Actions

CLASS PLAINTIFFS' COORDINATION AND SCHEDULING PROPOSAL

In accordance with the Court's order that all parties to submit their coordination and scheduling proposals (ECF No. 817), Class Plaintiffs hereby propose the following:

Class Plaintiffs strongly believe that the existing deadlines entered in Pretrial Scheduling Order entered at ECF No. 658 should remain in place. Class Plaintiffs are happy to coordinate regarding discovery issues with Plaintiffs' counsel in the *Cheney Bros., Inc. v. Agri Stats, Inc., Sysco Corp. v. Agri Stats, Inc.*, and *Action Meat Distributors, Inc. v. Agri Stats, Inc.* actions (the "new DAPs"), and believe that all Plaintiffs' counsel can work together to complete all fact discovery by the current September 1, 2022 deadline.

Class Plaintiffs believe that the actions recently transferred to this Court by the J.P.M.L., in its order creating MDL No. 2998, should all be centralized and coordinated as part of MDL No. 2998. Class Plaintiffs propose that "MDL No. 2998" be added to the caption of future filings, and that this docket, Case No. 18-cv-1778, remain the master docket for this litigation moving forward.

Class Plaintiffs do not take any position regarding disclosure or production deadlines for the new DAPs, provided that these dates do not affect existing deadlines.

Dated: July 8, 2021

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